

PERFORMANCE AUDIT  
OF THE  
BUREAU OF SAFETY AND REGULATION  
DEPARTMENT OF CONSUMER AND INDUSTRY SERVICES

January 1998

## EXECUTIVE DIGEST

# BUREAU OF SAFETY AND REGULATION

INTRODUCTION	<p>This report, issued in January 1998, contains the results of our performance audit* of the Bureau of Safety and Regulation, Department of Consumer and Industry Services.</p>
AUDIT PURPOSE	<p>This performance audit was conducted as part of the constitutional responsibility of the Office of the Auditor General. Performance audits are conducted on a priority basis related to the potential for improving effectiveness* and efficiency*.</p>
BACKGROUND	<p>The Bureau of Safety and Regulation's primary responsibility is to administer and enforce the provisions of (MIOSHA). The purpose of MIOSHA is to provide Michigan employees with safe and healthful work</p> <p>The General Industry Safety Division, Construction Safety Division, and Occupational Health Division conduct</p> <p>enforce occupational safety and health standards. The Safety Education and Training (SET) Division educates</p> <p>prevent hazardous working conditions.</p>

\* See glossary on page 42 for definition.

The Standards Division provides the necessary support services in the promulgation and distribution of standards. The Appeals Division represents the Bureau in formal appeals of citations issued as a result of MIOSHA inspections. The MIOSHA Information Division maintains and distributes occupational injury, illness, fatality, and enforcement data.

The Employee Discrimination Division administers and enforces the provisions of MIOSHA that protect employees from discrimination when exercising rights afforded by MIOSHA.

The Wage Hour Division administers the laws which protect the wages and fringe benefits of workers and provide for the safe and legal employment of minors.

As of August 31, 1997, the Bureau had 259 employees. Total Bureau appropriations for fiscal year 1996-97 were approximately \$24 million.

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**AUDIT OBJECTIVES,  
CONCLUSIONS, AND  
NOTEWORTHY  
ACCOMPLISHMENTS**

**Audit Objective:** To assess the effectiveness of the Bureau's efforts to provide Michigan workers with safe and healthful workplaces.

**Conclusion:** The Bureau was generally effective in providing Michigan workers with safe and healthful workplaces. However, we noted reportable conditions\* in the areas of continuous quality improvement, priority selection, abatement assurance\* , complaint inspections, repeat violations, inspectors'\* performance evaluations, and SET grants (Findings 1 through 7).

\* See glossary on page 42 for definition.

**Noteworthy Accomplishments:** As part of the Bureau's efforts to educate employers and employees in safety and health awareness, the Bureau participates in the annual Michigan Safety Conference and the annual Industrial Ventilation Conference. During the multiday conferences, the Bureau provides employers and employees with extensive safety and health information, introduces the latest safety and health technology, and offers hands-on training and demonstrations. In the last two years, 13,838 people attended the conferences.

**Audit Objective:** To assess the efficiency of the Bureau's administration of standards promulgation, enforcement, education and training, citation appeals, and the Bureau's information systems.

**Conclusion:** The Bureau was generally efficient in its administration of standards promulgation, enforcement, education and training, citation appeals, and the Bureau's information systems. However, we noted a reportable condition in the Bureau's processing of employee discrimination complaints (Finding 8).

**Audit Objective:** To assess the Bureau's compliance with applicable statutes; rules and regulations; and State, Department, and Bureau policies and procedures.

**Conclusion:** The Bureau was generally in compliance with applicable statutes; rules and regulations; and State, Department, and Bureau policies and procedures.

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**AUDIT SCOPE AND  
METHODOLOGY**

Our audit scope was to examine the program and other records of the Bureau of Safety and Regulation, Department of Consumer and Industry Services. Our audit was conducted in accordance with *Government Auditing*

*Standards* issued by the Comptroller General of the United States and, accordingly, included such tests of the records and such other auditing procedures as we considered necessary in the circumstances.

Our review and testing of Bureau records and procedures was primarily limited to the period October 1, 1994 through August 31, 1997.

We reviewed the Bureau's system for monitoring the accomplishment of its mission\* . Also, we reviewed inspection files, analyzed inspection activity, and evaluated inspection response times. In addition, we reviewed the appeals process for effectiveness. Further, we assessed the Bureau's procedures for evaluating the performance of its inspectors and consultants. We evaluated the Bureau's education and training efforts and its effectiveness in contracting for and monitoring safety education and training grants. Finally, we determined the effectiveness of the Bureau's standards promulgation and distribution process.

We determined whether the Bureau was efficient in its inspection, education, and training efforts. Also, we reviewed the Bureau's assignment of work loads for reasonableness. In addition, we determined whether the Bureau was in compliance with MIOSHA; administrative rules and regulations; and State, Department, and Bureau policies and procedures.

We surveyed employers to obtain information regarding the timeliness and quality of services provided by the Bureau. A description of the survey and a summary of

\* See glossary on page 42 for definition.

survey responses are presented as supplemental information.

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**AGENCY RESPONSES  
AND PRIOR AUDIT  
FOLLOW-UP**

Our audit report includes 8 findings and 9 corresponding recommendations. The preliminary response prepared by the Bureau indicated that it agreed with all of our findings and has complied or has taken steps to comply with each of the recommendations.

The Bureau had complied with 8 of the 9 prior audit recommendations included within the scope of our current audit. One finding was rewritten for inclusion in this report.



Ms. Kathleen M. Wilbur, Director  
Department of Consumer and Industry Services  
G. Mennen Williams Building  
Lansing, Michigan

Dear Ms. Wilbur:

This is our report on the performance audit of the Bureau of Safety and Regulation, Department of Consumer and Industry Services.

This report contains our executive digest; description of agency; audit objectives, scope, and methodology and agency responses and prior audit follow-up; comments, findings, recommendations, and agency preliminary responses; description of survey and summary of survey responses, presented as supplemental information; and a glossary of acronyms and terms.

Our comments, findings, and recommendations are organized by audit objective. The agency preliminary responses were taken from the agency's responses subsequent to our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited agency develop a formal response within 60 days after release of the audit report.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

Thomas H. McTavish, C.P.A.  
Auditor General





## **TABLE OF CONTENTS**

### **BUREAU OF SAFETY AND REGULATION DEPARTMENT OF CONSUMER AND INDUSTRY SERVICES**

#### **INTRODUCTION**

	<b><u>Page</u></b>
Executive Digest	1
Report Letter	7
Description of Agency	11
Audit Objectives, Scope, and Methodology and Agency Responses and Prior Audit Follow-Up	13

#### **COMMENTS, FINDINGS, RECOMMENDATIONS, AND AGENCY PRELIMINARY RESPONSES**

Effectiveness of Efforts	15
1. Continuous Quality Improvement Process	15
2. Priority Selection System	18
3. Abatement Assurance	21
4. Complaint Inspections	22
5. Repeat Violations	24
6. Inspectors' Performance Evaluations	25
7. SET Grants	27
Efficiency of Administration	30
8. Employee Discrimination Complaints	30
Compliance	31

## SUPPLEMENTAL INFORMATION

Description of Survey	33
Summary of Survey Responses	34

## GLOSSARY

Glossary of Acronyms and Terms	42
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## Description of Agency

The Bureau of Safety and Regulation's primary responsibility is to administer and enforce the provisions of the Michigan Occupational Safety and Health Act (MIOSHA), Sections 408.1001 - 408.1094 of the *Michigan Compiled Laws* (Act 154, P.A. 1974, as amended). The purpose of MIOSHA is to provide Michigan employees with safe and healthful work environments free of recognized hazards.

The occupational health provisions of MIOSHA were administered and enforced by the Occupational Health Division, Bureau of Environmental and Occupational Health, Department of Public Health until April 1, 1996, when Executive Order 1996-1 transferred the Division to the Bureau of Safety and Regulation, Department of Labor. Executive Order 1996-2 transferred the Bureau of Safety and Regulation from the Department of Labor to the Department of Consumer and Industry Services, effective May 15, 1996.

The Bureau of Safety and Regulation consists of nine divisions:

- a. The General Industry Safety Division, Construction Safety Division, and Occupational Health Division conduct inspections and investigations in places of employment to enforce occupational safety and health standards to help ensure a safe and healthful workplace for employees. The Occupational Health Division also provides health-related education and training for employers and employees.
- b. The Safety Education and Training (SET) Division educates employers and employees in safety awareness and provides assistance in the development and implementation of safety programs and in recognizing, abating, and preventing hazardous working conditions. In addition, the Bureau has a SET Grant Administrator who is responsible for administering and monitoring SET grants to subrecipients.
- c. The Standards Division provides the necessary support services in the promulgation of safety and health standards and is responsible for the distribution of standards to interested parties.

- d. The Appeals Division represents the Bureau in formal appeals of citations issued as a result of MIOSHA inspections.
- e. The MIOSHA Information Division (MID) conducts employer surveys in cooperation with the federal Bureau of Labor Statistics and the Occupational Safety and Health Administration. MID also maintains and distributes occupational injury, illness, fatality, and enforcement data.
- f. The Employee Discrimination Division administers and enforces the provisions of MIOSHA that protect employees from discrimination when exercising rights afforded by MIOSHA.
- g. The Wage Hour Division administers the laws which protect the wages and fringe benefits of workers and provide for the safe and legal employment of minors.

As of August 31, 1997, the Bureau had 259 employees. Total Bureau appropriations for fiscal year 1996-97 were approximately \$24 million.

## Audit Objectives, Scope, and Methodology and Agency Responses and Prior Audit Follow-Up

### Audit Objectives

Our performance audit of the Bureau of Safety and Regulation, Department of Consumer and Industry Services, had the following objectives:

1. To assess the effectiveness of the Bureau's efforts to provide Michigan workers with safe and healthful workplaces.
2. To assess the efficiency of the Bureau's administration of standards promulgation, enforcement, education and training, citation appeals, and the Bureau's information systems.
3. To assess the Bureau's compliance with applicable statutes; rules and regulations; and State, Department, and Bureau policies and procedures.

### Audit Scope

Our audit scope was to examine the program and other records of the Bureau of Safety and Regulation, Department of Consumer and Industry Services. Our audit was conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included such tests of the records and such other auditing procedures as we considered necessary in the circumstances.

### Audit Methodology

Our fieldwork was performed during April through August 1997. Our review and testing of Bureau records and procedures was primarily limited to the period October 1, 1994 through August 31, 1997.

We reviewed the Bureau's system for monitoring the accomplishment of its mission. Also, we selected a sample of inspection files for the period April 1, 1995 through March 31, 1997 to determine the completeness and accuracy of inspection documentation. In addition, we analyzed inspection activity and evaluated response times for fatalities, accidents, complaints, referrals, and follow-ups. Further, we

reviewed the appeals process for effectiveness, and the effect of prehearings and informal settlement agreements on the number of appeals.

We assessed the Bureau's procedures for evaluating the performance of its inspectors and consultants. Also, we evaluated the Bureau's education and training efforts and its effectiveness in contracting for and monitoring safety education and training grants. Finally, we determined the effectiveness of the Bureau's standards promulgation and distribution process.

We determined whether the Bureau was efficient in its inspection, education, and training efforts. Also, we reviewed the Bureau's assignment of work loads for reasonableness. In addition, we determined whether the Bureau was in compliance with the Michigan Occupational Safety and Health Act; administrative rules and regulations; and State, Department, and Bureau policies and procedures.

We surveyed employers to obtain information regarding the timeliness and quality of services provided by the Bureau. A description of the survey and a summary of survey responses are presented as supplemental information.

#### Agency Responses and Prior Audit Follow-Up

Our audit report includes 8 findings and 9 corresponding recommendations. The preliminary response prepared by the Bureau indicated that it agreed with all of our findings and has complied or has taken steps to comply with each of the recommendations.

The agency preliminary response which follows each recommendation in our report was taken from the agency's written comments and oral discussion subsequent to our audit fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and Department of Management and Budget Administrative Guide procedure 1280.02 require the Department of Consumer and Industry Services to develop a formal response to our audit findings and recommendations within 60 days after release of the audit report.

The Bureau had complied with 8 of the 9 prior audit recommendations included within the scope of our current audit. One finding was rewritten for inclusion in this report.

# COMMENTS, FINDINGS, RECOMMENDATIONS, AND AGENCY PRELIMINARY RESPONSES

## EFFECTIVENESS OF EFFORTS

### COMMENT

**Audit Objective:** To assess the effectiveness of the Bureau of Safety and Regulation's efforts to provide Michigan workers with safe and healthful workplaces.

**Conclusion:** The Bureau was generally effective in providing Michigan workers with safe and healthful workplaces. However, we noted reportable conditions in the areas of continuous quality improvement, priority selection, abatement assurance, complaint inspections, repeat violations, inspectors' performance evaluations, and safety education and training (SET) grants.

**Noteworthy Accomplishments:** As part of the Bureau's efforts to educate employers and employees in safety and health awareness, the Bureau participates in the annual Michigan Safety Conference and the annual Industrial Ventilation Conference. During the multiday conferences, the Bureau provides employers and employees with extensive safety and health information, introduces the latest safety and health technology, and offers hands-on training and demonstrations. In the last two years, 13,838 people attended the conferences.

### FINDING

#### 1. Continuous Quality Improvement Process

The Bureau had not fully developed a continuous quality improvement (CQI) process for monitoring and improving its effectiveness in providing Michigan employees with safe and healthful work environments.

Effectiveness and efficiency can best be evaluated by establishing a CQI process. Such a process should include: performance standards or goals\* that describe the desired level of outcomes; performance measures\* for measuring outcomes\* ; a management information system to gather accurate performance data; a

\* See glossary on page 42 for definition.



comparison of performance data to desired outcomes; reporting the comparison results to management; and proposing program changes to improve effectiveness.

The Bureau had used partial components of a CQI process. The Bureau's divisions gathered and submitted various program data to Bureau management that was routinely reported to Department of Consumer and Industry Services management, the Legislature, and other users. However, we noted the following deficiencies in the Bureau's CQI process:

- a. The Bureau had not developed performance standards or goals by which Bureau and Department management and the Legislature could assess the Bureau's effectiveness and efficiency.

The Bureau compared its performance measures to previous years' performance measures in its quarterly performance measure reports. However, the Bureau had not developed performance standards or goals that described the desired level of outcomes. Without anticipated outcomes or goals, the Bureau could not evaluate its performance and initiate changes to improve effectiveness.

- b. The Bureau had not established sufficient outcome-based performance measures.

Our review of the Bureau's fiscal year 1996-97 quarterly performance measure reports (prepared by the divisions) disclosed that the Bureau primarily measured outputs\* , rather than outcomes. Outputs are necessary to measure the level of products or services produced, such as the number of inspections conducted or the number of employers trained in safety and/or health issues. However, outcomes are necessary for the Bureau to evaluate its impact or effectiveness in providing Michigan employees with safe and healthful work environments. Outcome-based performance measures could include the reduction of injury/illness rates in high hazard industries or the increase in the number of employers with an effective safety and health program.

\* See glossary on page 42 for definition.

At the time of our review, the Bureau was in the process of meeting with the Department's performance measures coordinator to develop additional outcome-based performance measures.

- c. The Bureau did not ensure that performance measures reported by its divisions were accurate and supported.

We reviewed the accuracy of selected fiscal year 1996-97 quarterly performance measure reports prepared by the divisions and reported to Bureau management. We noted inaccuracies in or a lack of supporting documentation for reports prepared by 5 of 8 divisions we audited. In 4 of the divisions, we considered some of the inaccuracies to be significant. For example, in its third quarter report, the Appeals Division reported the total number of cases pending as 347. Our review indicated that, based on Division records, the number of cases pending was actually 410, an 18% difference. Also, in its third quarter report, the Occupational Health Division (OHD) reported that 100% of the consultations performed by its Consultation Section were conducted in high hazard establishments. Our review indicated that only 86% of its 21 consultations were conducted in high hazard establishments. Finally, OHD also reported that 65% of the serious hazards noted during its on-site consultations were corrected by employers within 60 days. OHD could not provide us with documentation to support the measure reported.

To be effective, a performance measurement system\* must provide for accurate and reliable representation of performance.

The State Legislature and the Governor have required, in department appropriation acts and Executive Directive 1996-1, that State programs use CQI processes to manage the use of limited State resources.

The federal Occupational Safety and Health Administration's (OSHA's) efforts in program performance monitoring also support the importance of the Bureau's need to develop an effective CQI process. The federal Government Performance and

\* See glossary on page 42 for definition.

Results Act (GPRA) of 1993 was passed to improve the effectiveness and efficiency of federal programs by establishing a system to set performance goals, measure results, and report program performance.

The Bureau administers and enforces the State's Occupational Safety and Health Act (MIOSHA) State Plan and operates under the oversight of OSHA, which was one of 77 federal agencies that volunteered for the pilot project to implement GPRA. Nearly 50% of the Bureau's funding is from federal grants. At the time of our review, OSHA was undecided as to how its strategic plan will impact the states with state plans and how OSHA will evaluate state performance. At the start of fiscal year 1997-98, OSHA will begin implementation of its strategic plan.

### **RECOMMENDATION**

We recommend that the Bureau fully develop a CQI process for monitoring and improving its effectiveness in providing Michigan employees with safe and healthful work environments.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with the importance of continually refining and improving the quality review and performance measurement system that it initiated in fiscal year 1993-94. The Bureau continues its work with staff of the Department's Budget Development Office to improve its CQI system. These efforts include developing better outcome-based performance measures and ensuring the accuracy of performance data. These goals and measures will form the Bureau's strategic plan as documented in its fiscal year 1998-99 federal grants.

### **FINDING**

#### **2. Priority Selection System**

The Bureau did not have an effective priority selection system to help ensure that the most hazardous workplaces were considered for scheduled inspections by its General Industry Safety Division (GISD) and for education, training, and consultation services by the SET Division.

The MIOSHA Information Division (MID) developed priority selection listings for GISD so it could inspect those businesses that were more likely to have highly

hazardous workplaces. MID also developed a priority selection listing for the SET Division to use in marketing its education, training, and consultation services to workplaces with the potential for highly hazardous conditions.

The source of data for the Bureau's priority selection system was the Worker's Compensation Employer's Basic Report of Injury (form 100). Employers are required to complete a form 100 whenever an employee is injured or becomes ill while performing duties at an employer's workplace. Form 100 provided the Bureau with Michigan employers' specific injury and illness information. This enabled the Bureau to target establishments with highly hazardous workplaces for general industry safety inspections and education, training, and consultation services. Michigan was one of the first states to establish a priority selection system based on employer specific data, and Michigan's system had become nationally recognized for its effectiveness in targeting highly hazardous establishments. However, as of November 28, 1994, the Bureau discontinued receiving the form 100 data. Our review of the Bureau's efforts since it lost access to the form 100's disclosed:

- a. The Bureau had not been using current data in its priority selection system for selecting establishments for general safety inspections and education, training, and consultation services.

In March and August 1996, MID used the 1994 data to create two different priority selection listings for GISD for scheduling general inspections. The Bureau had to prepare the two selection listings based on the form 100's it had received as of November 28, 1994.

For education, training, and consultation purposes, MID created a priority listing in February 1996 using the 1994 form 100 data. At the time of our review, many of the establishments on the listing were no longer in business.

- b. The Bureau had not implemented an alternative priority selection system to be used in lieu of the system that was based on the form 100 data.

The Bureau was attempting to regain access to the form 100's because of their importance in the Bureau's priority selection system. In the meantime,

the Bureau developed several alternative methods for establishing a priority selection system for targeting inspections; these methods could also be used to select establishments for education, training, and consultation services.

At the time of our review, the Bureau had not chosen or implemented any of the alternative methods for its priority selection system. As a result, the Bureau was not efficient in assigning general inspections to its GISD inspectors. In addition, the SET Division had a limited selection of establishments to contact for marketing its education, training, and consultation efforts. Further, we noted that GISD inspectors in some regions had completed their scheduled inspections from the second priority selection listing and had to travel to help complete scheduled inspections in other regions. Also, the SET Division's education, training, and consultation programs had exhausted their priority selection listing at the time of our review.

An effective priority selection system would help the Bureau accomplish its mission of providing Michigan workers with safe and healthful workplaces. Such a system would help ensure that the most highly hazardous workplaces are inspected, and it would provide the opportunity for the Bureau to offer education, training, and consultation services to those employers with the most need.

We were informed by the Bureau, at the completion of our fieldwork, that it was going to implement an alternative priority selection system effective October 1, 1997.

### **RECOMMENDATION**

We recommend that the Bureau revise its current priority selection system to help ensure that the most hazardous workplaces are considered for scheduled inspections by GISD and for education, training, and consultation services by the SET Division.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with this recommendation and, as of October 1, 1997, had established alternate methods for its priority selection system using a number of

different approaches. The Bureau is also continuing to pursue methods to regain access to the form 100, as well as the development and refinement of alternative systems.

## **FINDING**

### **3. Abatement Assurance**

The Bureau did not require employers to provide abatement assurance to the Construction Safety Division (CSD) for all hazards identified during CSD safety inspections, in accordance with established procedures.

CSD conducts inspections of construction sites in Michigan to enforce occupational safety standards in order to help ensure safe workplaces. At the completion of an inspection, CSD will issue citations, including monetary penalties, to an employer for any identified hazards which are in violation of safety standards. In accordance with MIOSHA (Section 408.1033(3) of the *Michigan Compiled Laws*), CSD requires employers to abate the hazards and provide CSD with abatement assurance. Acceptable methods for providing abatement assurance include: a detailed description of how the violations were corrected, photographs of the corrected conditions, and other forms of conclusive evidence that employees are no longer exposed to the hazard. CSD procedures state that abatement assurance documentation must be provided to CSD by an employer before the file on the inspection can be closed. CSD may conduct a follow-up inspection if abatement assurance is not obtained.

We reviewed 30 CSD inspection files and determined whether CSD obtained the required abatement assurance for all 21 that contained citations. Four (19%) of the 21 files did not include documentation that CSD had obtained abatement assurance for 5 violations cited during the inspections. Each of the inspection files was closed and CSD had not conducted any follow-up inspections. CSD cited 1 of the 5 violations as a serious violation. MIOSHA defines a serious violation as one which has a substantial probability that death or serious physical harm could result from the violation.

The purpose of abatement assurance is to help ensure that recognized hazards are corrected, making construction worksites safe for workers. Without proper

abatement assurance, as required by MIOSHA and Bureau procedures, the Bureau cannot be sure that it is effective in protecting Michigan workers.

### **RECOMMENDATION**

We recommend that the Bureau require employers to provide abatement assurance for all hazards identified during CSD safety inspections, in accordance with established procedures.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with this recommendation. All hazards identified during CSD safety inspections are now followed up with abatement assurance in accordance with established procedures that are utilized by GISD and OHD as well.

### **FINDING**

#### **4. Complaint Inspections**

OHD did not conduct unprogrammed inspections concerning serious formal complaints in accordance with established procedures.

OHD Field Operations Manual chapter IX, section A, item 7b(2) requires OHD to conduct inspections concerning all serious formal complaints within 30 days from receipt of the complaints by OHD. In addition, chapter II, section E, item 1 requires OHD to conduct the inspections regarding complaints prior to conducting programmed inspections. The OHD Field Operations Manual defines these unprogrammed inspections as inspections scheduled in response to alleged hazardous working conditions that have been identified at a specific worksite. Programmed inspections are inspections of worksites which have been scheduled based upon objective or neutral selection criteria.

As of July 1997, OHD had 26 serious formal complaints for which it had not completed investigations:

- a. OHD had not investigated the serious formal complaints on a timely basis in compliance with established procedures. OHD had not initiated an investigation for 17 of the complaints at the time of our review. Fourteen

(82%) of the 17 complaints were over 30 days old, with the oldest complaint being 170 days old.

OHD had initiated investigations of 9 of the complaints at the time of our review; however, 2 (22%) of the 9 complaints were over 30 days old when OHD initiated the investigations.

- b. OHD did not conduct inspections in accordance with established priorities. We reviewed the inspection activity for 2 of the 6 OHD districts and noted that both districts had been conducting lower priority, programmed inspections at the same time they had pending serious formal complaints.

The purpose of MIOSHA is to provide Michigan employees with safe and healthful work environments free of identified hazards. The Bureau acknowledged the importance of serious formal complaints by establishing timeliness and priority standards in the OHD Field Operations Manual. OHD's noncompliance with established procedures could result in potential hazardous working conditions which are identified at specific worksites not being corrected.

### **RECOMMENDATION**

We recommend that OHD conduct unprogrammed inspections concerning serious formal complaints in accordance with established procedures.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with this recommendation. Since the identification of this issue during the audit, OHD has established procedures to ensure that all serious complaint investigations are initiated prior to opening lower priority inspections.

### **FINDING**

#### **5. Repeat Violations**

The Bureau had not developed effective procedures to help ensure that CSD cited safety violations as repeat violations if appropriate.

CSD conducts inspections of construction sites in Michigan to enforce occupational safety standards in order to help ensure safe workplaces. At the



completion of an inspection, CSD will issue citations, including monetary penalties, to an employer for identified hazards which are in violation of safety standards. CSD Field Operations Manual chapter III, section E, item 12b(1) states that CSD may cite an employer for a repeat violation when, upon reinspection, another violation of a substantially similar condition from a previously cited section of a standard is found (within a 24-month period). For the purpose of considering whether a violation is a repeat violation for an inspection of a construction site, item 12b(3) states that repeat violations may be alleged based on an employer's prior violations that occurred anywhere in the State. In addition, chapter VII, section B, item 14b states that penalties for repeat violations shall generally be doubled for the first repeat violation and quadrupled if the violation has been cited twice before. If a third repetition of a violation has occurred, the penalty shall be multiplied by 10.

We reviewed 7 CSD inspection files that had closed inspection dates during the period April 1, 1996 through March 31, 1997. For each of these inspections, CSD had cited the employer for violation of safety standards. We reviewed the history files and determined that, for 2 of the 7 inspections, CSD had cited each for violation of the same safety standard the employer had previously violated; however, CSD had not cited the last violation as a repeat violation. Therefore, if CSD had established procedures to consider the violations as repeat violations, it could have cited the employers an additional \$700 for the 2 repeat violations.

By increasing citation penalties for repeat violations in accordance with established procedures, the Bureau may help deter repeat violations of safety standards, thereby better protecting Michigan workers from hazardous workplaces.

### **RECOMMENDATION**

We recommend that the Bureau develop effective procedures to help ensure that CSD cites safety violations as repeat violations if appropriate.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with the importance of CSD accurately citing repeat violations. It is common for a construction employer to have a number of different sites active

in the State. CSD evaluates each one investigated to determine the appropriateness of a repeat violation. In most of these situations, the supervisors and employees are completely different between sites. In such cases, CSD will not cite a repeat violation. The Bureau will reexamine this policy to ensure that both employers and employees are treated consistently and fairly within the unique context of construction operations and with regard to controlling case precedent.

## **FINDING**

### **6. Inspectors' Performance Evaluations**

The Bureau did not have effective procedures for conducting inspectors' performance evaluations.

GISD, CSD, and OHD each employ field inspectors who are responsible for conducting inspections and investigations in places of employment to enforce occupational safety and health standards. In fiscal year 1995-96, inspectors conducted approximately 7,300 inspections, reported nearly 30,000 violations, and assessed employers penalties in excess of \$6 million.

We reviewed the Bureau's procedures for supervisors evaluating the performance of inspectors in the three divisions:

- a. Neither the Bureau nor any of the three divisions had developed a formal policy requiring performance evaluations for inspectors, including the frequency of evaluations, type of evaluation (on-site evaluation vs. desk review), etc.
- b. The frequency and type of performance evaluations conducted in each of the divisions differed significantly. We selected a sample of inspectors from each of the three divisions to determine the frequency and type of performance evaluations completed by supervisors during the 1996 calendar year:
  - (1) GISD's supervisors conducted on-site evaluations of their inspectors; however, not at the frequency required by informal division procedures. GISD's assistant chief issued a memo requiring supervisors to conduct

on-site evaluations of their inspectors at least once every six weeks, which equates to approximately 8 evaluations per year. We reviewed evaluations for 6 of the 25 inspectors (one inspector for each of the 6 supervisors) and noted that the number of evaluations completed ranged from 0 to 4 for each of the 6 inspectors.

- (2) CSD's supervisors did not complete any type of performance evaluations for any of the 4 inspectors we reviewed.
- (3) OHD's supervisors conducted annual desk reviews of their inspectors; however, they did not conduct any on-site evaluations. We reviewed evaluations for 5 of the 22 inspectors (each from a different district) and noted that supervisors had completed only annual desk reviews for each of the 5 inspectors.

In each of the divisions, we noted that the supervisors did review the inspectors' written reports on a regular basis to monitor inspection activity. In addition to these reviews, formal performance evaluation procedures would help the Bureau determine whether inspectors are conducting comprehensive inspections in accordance with MIOSHA and Bureau policy and procedures. Unlike desk reviews, on-site evaluations would allow supervisors to observe inspectors' conduct in the field and evaluate inspectors' thoroughness of inspections, professionalism, knowledge, and communication skills. Performance evaluations, including on-site evaluations, may also be useful in identifying inspectors' training needs. The completion of on-site evaluations as part of performance evaluations is especially important because of the decentralized structure of the three divisions.

### **RECOMMENDATION**

We recommend that the Bureau develop effective procedures for conducting inspectors' performance evaluations.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with the importance of performance evaluations and has already taken steps to ensure that such evaluations are performed for all field

staff. Because of differences in functions and focus, the divisions will utilize a format designed to meet their specific needs, rather than a uniform format.

## **FINDING**

### **7. SET Grants**

The Bureau did not ensure that contracts for safety education and training (SET) grants were prepared in accordance with requirements established in its request for proposal (RFP). In addition, the Bureau was not effective in its financial monitoring of SET grants.

The Bureau administered SET grants awarded to employers, employees, and independent institutions that provided innovative approaches to occupational safety and health. The objective of the grant program is to develop and deliver special safety and health training programs in areas not normally served by the Bureau's SET Division. The Bureau awarded \$2.55 million for 50 SET grant projects during the period October 1, 1994 through September 30, 1997. Award amounts for these 50 grants ranged from \$15,000 to \$77,500 per grant. Our review of three grant projects totaling \$217,500 disclosed:

- a. The Bureau did not ensure compliance with established grant criteria when contracting for SET grants with grantees. In fiscal year 1995-96, the Bureau awarded SET grant funding to one of the three grantees for project expenditures that did not meet established grant criteria. The RFP specified criteria for allowable SET grant project expenditures, which included salaries and wages of key project personnel. However, the Bureau provided funding to the grantee for salaries and wages that included \$6,440 for the project director's automobile allowance and insurance. The Bureau also provided funding to this grantee for travel at a mileage rate of \$.14 per mile. The RFP did not list automobile allowances and insurance as an allowable salary and wage expenditure. In addition, the RFP stated that travel expenditures must conform to the State *Standardized Travel Regulations*, including mileage reimbursable at the State mileage rate of \$.29 per mile. The State *Standardized Travel Regulations* did not provide for automobile allowances or insurance reimbursements.

The grantee would have been provided \$5,156 less in SET grant funding (the difference between \$7,638, the amount provided for the automobile allowance and insurance and travel, and \$2,482, the amount for travel reimbursable at the State mileage rate) if the Bureau's contracts for SET grants were prepared in accordance with established grant criteria and the State *Standardized Travel Regulations*.

- b. The Bureau did not have a method to help ensure grantees used SET grant funding for approved SET project activities and expenditures. We reviewed the Bureau's grant monitoring and disbursement procedures:
  - (1) The Bureau required grantees to submit quarterly financial status reports containing only summary grant expenditure information when it requested award reimbursements and evidence of grant activity expenditures. The Bureau, under the terms of the grant contracts, required grantees to maintain supporting documentation to justify all expenditures. The Bureau did not require grantees to submit documentation to support summary grant expenditure information prior to disbursement of grant funds.
  - (2) During our prior audit, we noted that the Bureau contracted with public accounting firms to perform audits of the grantees. We were informed by the Bureau that this process was eliminated because the audits were not effectively conducted in a timely manner. Therefore, the Bureau did not require grantees to obtain an independent audit and submit audit reports during our current audit period in order to determine the propriety of grant expenditures.
  - (3) The Bureau conducted on-site visits to help ensure that grantee project activities were consistent with the activities specified in the grant contract. However, during the on-site visits, the Bureau did not review the propriety of documentation supporting grant expenditures.

The Bureau could use any of the above methods or a combination of these or other methods for financial monitoring of its SET grants.

It is important for the Bureau to be effective in its contracting and monitoring processes because of the limited funds available for SET grants. For the grant periods October 1, 1994 through September 30, 1997, the Bureau was unable to fund 43 grant requests totaling nearly \$3 million.

### **RECOMMENDATIONS**

We recommend that the Bureau prepare contracts for SET grants in accordance with requirements established in its RFP.

We also recommend that the Bureau improve its effectiveness in its financial monitoring of SET grants.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with the first recommendation. Prior to the release of the RFP for funding grants in fiscal year 1998-99, the RFP document will be thoroughly reviewed and the language clarified with regard to budget categories, allowable expenditures, and the Bureau's discretion in negotiations. Contracts will then be developed consistent with that language.

The Bureau also agreed with the second recommendation and will continue the practice initiated in fiscal year 1996-97 of requesting the Department's internal auditor to audit the SET grantees. Further, procedures will be developed and implemented to review financial documentation supporting grant expenditures during on-site grant monitoring.

## **EFFICIENCY OF ADMINISTRATION**

### **COMMENT**

**Audit Objective:** To assess the efficiency of the Bureau's administration of standards promulgation, enforcement, education and training, citation appeals, and the Bureau's information systems.

**Conclusion:** The Bureau was generally efficient in its administration of standards promulgation, enforcement, education and training, citation appeals, and the Bureau's information systems. However, we noted a reportable condition in the Bureau's processing of employee discrimination complaints.

## **FINDING**

### **8. Employee Discrimination Complaints**

The Bureau was not efficient in processing employee discrimination complaints.

Under MIOSHA, an employee may file a complaint with the Bureau against his/her employer if the employee believes he/she has been discriminated against when exercising the rights afforded by MIOSHA. MIOSHA requires the Bureau to investigate an employee's complaint and notify the complainant of the Bureau's determination within 90 days after receipt of the complaint (Section 408.1065(3) of the *Michigan Compiled Laws*).

We reviewed the Employee Discrimination Division's processing of complaints for the 18-month period ended March 1997. We determined that the Division's average time to process complaints was 144 days. The Division exceeded the 90-day MIOSHA requirement for 115 (57%) of the 203 complaints processed during the period. The processing time for these 115 complaints ranged from 93 to 712 days.

We determined that the Division maintained a backlog of unprocessed complaints during the same 18-month period. In November 1996, the Division's backlog of 39 complaints was the lowest backlog during the 18-month period. However, by March 1997, the backlog had increased to 66 complaints.

We were informed by the Division that it experienced staffing shortages during the period we reviewed that significantly contributed to the backlog and the untimely processing of complaints. The Division also informed us that untimely responses to its inquiries by employers and/or employers' attorneys also affected the number of days it took to process complaints. The Division informed us that, although it had limited control over these untimely responses, it did make reasonable efforts to lessen delays whenever possible.

Improving the timeliness of complaint processing could improve the Bureau's effectiveness in protecting employees from discrimination when they exercise their rights afforded by MIOSHA. Also, processing employee discrimination complaints on a more timely basis could reduce potential employer liability.

### **RECOMMENDATION**

We recommend that the Bureau improve its efficiency in processing employee discrimination complaints.

### **AGENCY PRELIMINARY RESPONSE**

The Bureau agreed with this recommendation. Staff shortages in the Employee Discrimination Division have been acceptably addressed and an improved tracking system has been implemented. These efforts will improve the Division's timely response to complaints. Regardless, the Division's timeliness to finalize resolution of discrimination complaints is comparable to federal OSHA.

## **COMPLIANCE**

### **COMMENT**

**Audit Objective:** To assess the Bureau's compliance with applicable statutes; rules and regulations; and State, Department, and Bureau policies and procedures.

**Conclusion:** The Bureau was generally in compliance with applicable statutes; rules and regulations; and State, Department, and Bureau policies and procedures.



## SUPPLEMENTAL INFORMATION

## Description of Survey

We sent a survey to a sample of employers who received education and training services and/or a compliance inspection during the period April 1, 1996 through March 31, 1997. The survey focused on the timeliness and quality of services provided by Bureau of Safety and Regulation consultants, inspectors, etc.

We mailed the survey to 120 randomly selected employers. We received 57 responses, a response rate of 47.5%. In general, employers had positive comments regarding the education and training services provided and the compliance inspections conducted by the Bureau.

Following is a summary of the survey results that includes the number and percentage of responses received for each item. The total number of responses for each item may not agree with the total number of responses reported above because respondents were instructed to answer only the questions relating to the services they received.

BUREAU OF SAFETY AND REGULATION  
Department of Consumer and Industry Services  
Summary of Survey Responses

Number of surveys mailed	120
Number of responses	57
Response rate	47.5%

Safety and Health Education and Training

1. Did you receive any safety and/or health consultative assistance and/or education and training during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 21)
41	16
71.9%	28.1%

2. Which of the following education and training services did you receive? (Check all that apply)

20	26.7%	On-site Safety Consultation (mock inspection)
7	9.3%	Safety Seminar
12	16.0%	Safety Training
4	5.3%	Safety Administrator Course
2	2.7%	Safety Development Program
1	1.3%	Health Seminar
2	2.7%	Health Training
6	8.0%	On-site Health Consultation (mock inspection)
7	9.3%	Citation Abatement Assistance
5	6.7%	MIOSHA Standards Training
3	4.0%	Video Library
6	8.0%	Other

3. Did you receive any safety and/or health consultative assistance during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 11)
31	10
75.6%	24.4%

4. Your request for consultative assistance was confirmed:

<u>Immediately</u>	<u>Within</u> <u>1 - 4 days</u>	<u>Within</u> <u>5 - 8 days</u>	<u>Within</u> <u>9 - 14 days</u>	<u>More than</u> <u>2 weeks later</u>
6	12	6	3	2
20.7%	41.4%	20.7%	10.3%	6.9%

5. The consultation visit was conducted in a professional manner.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
15	16	0	0	0
48.4%	51.6%			

6. The consultant was knowledgeable about your operations and specific needs.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
16	13	2	0	0
51.6%	41.9%	6.5%		

7. The consultant explained MIOSHA standards and your responsibilities to you.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
15	14	2	0	0
48.4%	45.2%	6.5%		

8. Did you receive an on-site consultation (mock inspection)?

<u>Yes</u>	<u>No</u> (go to question 10)
26	5
83.9%	16.1%

9. The consultant explained your obligation to voluntarily correct, within an agreed to time frame, all hazards identified by the consultant.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
16	10	1	0	0
59.3%	37.0%	3.7%		

10. As a result of your consultation visit, managers, supervisors, and employees at your place of business are more aware of workplace safety and health issues.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
11	17	3	0	0
35.5%	54.8%	9.7%		

11. Did you attend a MIOSHA safety and/or health seminar or conference during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 15)
9	32
22.0%	78.0%

12. The presentation was conducted in a professional manner.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
4	5	0	0	0
44.4%	55.6%			

13. The presenter was knowledgeable of the subject.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
5	4	0	0	0
55.6%	44.4%			

14a. How satisfied were you with the adequacy of the seminar/conference rooms?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
2	6	1	0	0
22.2%	66.7%	11.1%		

14b. How satisfied were you with the adequacy of the training materials?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
6	3	0	0	0
66.7%	33.3%			

14c. How satisfied were you with the program topic?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
4	5	0	0	0
44.4%	55.6%			

14d. How satisfied were you with the program presentation?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
3	6	0	0	0
33.3%	66.7%			

14e. How satisfied were you with the program meeting your training needs?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
3	6	0	0	0
33.3%	66.7%			

15. Did you receive assistance from the Bureau of Safety and Regulation in developing a safety and/or health program in your workplace during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 18)
19	22
46.3%	53.7%

16. Please check the type of safety and/or health program your business was involved in.

14	66.7%	Safety Development Program
3	14.3%	Ergonomics Program
0	0.0%	Self Help Program (monitoring equipment)
4	19.0%	Other

- 17a. How satisfied were you with the knowledge of the consultant?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
11	8	0	0	0
57.9%	42.1%			

- 17b. How satisfied were you with the program training?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
5	10	1	0	0
31.3%	62.5%	6.3%		

- 17c. How satisfied were you with the consultant follow-up?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
5	10	2	0	0
29.4%	58.8%	11.8%		

- 17d. How satisfied were you with an increased awareness of workplace safety?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
6	12	0	0	0
33.3%	66.7%			

- 17e. How satisfied were you with an improvement in workplace safety?

<u>Very Satisfied</u>	<u>Satisfied</u>	<u>Undecided</u>	<u>Unsatisfied</u>	<u>Very Unsatisfied</u>
6	11	1	0	0
33.3%	61.1%	5.6%		

18. Did you receive any safety/health videos, brochures, pamphlets, etc., during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 21)
31	10
75.6%	24.4%

19a. The material was easily obtained.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
14	13	2	1	0
46.7%	43.3%	6.7%	3.3%	

19b. The material was current.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
12	16	2	0	0
40.0%	53.3%	6.7%		

19c. The material was comprehensive.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
10	16	4	0	0
33.3%	53.3%	13.3%		

19d. The material was understandable.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
9	19	2	0	0
30.0%	63.3%	6.7%		

19e. The material met your needs.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
9	18	3	0	0
30.0%	60.0%	10.0%		

20. Do you receive the *Mi*OSHA Newsquarterly newsletter?

<u>Yes</u>	<u>No</u>
11	17
39.3%	60.7%

Safety and Health Compliance Inspections

21. Did you receive a safety and/or health compliance inspection/investigation during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u> (go to question 33)
32	25
56.1%	43.9%

22. Were you aware of safety and/or health education and training available from the Bureau of Safety and Regulation prior to your compliance inspection?

<u>Yes</u>	<u>No</u>
22	10
68.8%	31.3%

23. The inspector (safety officer or industrial hygienist) explained your rights and responsibilities.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
9	21	1	1	0
28.1%	65.6%	3.1%	3.1%	

24. The inspector explained the inspection/investigation process during the opening conference.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
11	16	3	0	1
35.5%	51.6%	9.7%		3.2%

25. The inspection/investigation was conducted in a professional manner.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
13	15	2	1	1
40.6%	46.9%	6.3%	3.1%	3.1%

26. The inspector was knowledgeable of MIOSHA standards applicable to your business.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
15	14	1	1	1
46.9%	43.8%	3.1%	3.1%	3.1%

27. Did your inspection/investigation result in violations and citations?

<u>Yes</u>	<u>No</u> (go to question 30)
22	10
68.8%	31.3%



28. The inspector provided sufficient advice on correcting violations.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
13	7	2	1	1
54.2%	29.2%	8.3%	4.2%	4.2%

29. The completed Citation and Notification of Penalty form explained the violation(s) and penalty(ies).

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
9	13	2	0	0
37.5%	54.2%	8.3%		

30. You were informed by the inspector of the safety and/or health training and education programs available through the Bureau of Safety and Regulation.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
8	18	3	2	1
25.0%	56.3%	9.4%	6.3%	3.1%

31. The inspection process improved safety and/or health in your workplace.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
10	14	6	0	2
31.3%	43.8%	18.8%		6.3%

32. The inspection process increased the awareness of safety and/or health issues in your workplace.

<u>Strongly Agree</u>	<u>Agree</u>	<u>Undecided</u>	<u>Disagree</u>	<u>Strongly Disagree</u>
10	15	4	1	1
32.3%	48.4%	12.9%	3.2%	3.2%

#### Dissemination of MIOSHA Standards

33. Do you have a copy of the MIOSHA standards applicable to your business?

<u>Yes</u>	<u>No</u>
50	7
87.7%	12.3%

34. Was it easy to obtain MIOSHA standards from the Bureau of Safety and Regulation during April 1, 1996 through March 31, 1997?

<u>Yes</u>	<u>No</u>
44	5
89.8%	10.2%

35. How long did it take to receive MIOSHA standard(s) after you submitted your request?

<u>1 - 5 days</u>	<u>6 - 10 days</u>	<u>11 - 14 days</u>	<u>More than 2 weeks</u>
12	15	11	4
28.6%	35.7%	26.2%	9.5%

36. Is your workplace informed of new and/or amended MIOSHA standards by the Bureau of Safety and Regulation?

<u>Yes</u>	<u>No</u>
31	22
58.5%	41.5%

## Glossary of Acronyms and Terms

abate the hazards	The act of correcting safety hazards.
abatement assurance	Providing evidence that shows how safety violations were corrected.
CQI	continuous quality improvement.
CSD	Construction Safety Division.
effectiveness	Program success in achieving mission and goals.
efficiency	Achieving the most outputs and outcomes practical for the amount of resources applied or minimizing the amount of resources required to attain a certain level of outputs or outcomes.
GISD	General Industry Safety Division.
goals	The agency's intended outcomes or impacts for a program to accomplish its mission.
GPRA	federal Government Performance and Results Act.
inspector	A safety officer or an industrial hygienist who conducts inspections or investigations in places of employment to enforce occupational safety and health standards, respectively.
MID	MIOSHA Information Division.
MIOSHA	Michigan Occupational Safety and Health Act.
mission	The agency's main purpose or the reason the agency was

OHD	established. Occupational Health Division.
OSHA	federal Occupational Safety and Health Administration.
outcomes	The actual impacts of the program. Outcomes should positively impact the purpose for which the program was established.
outputs	The products or services produced by the program. The program assumes that producing its outputs will result in favorable program outcomes.
performance audit	An economy and efficiency audit or a program audit that is designed to provide an independent assessment of the performance of a governmental entity, program, activity, or function to improve public accountability and to facilitate decision making by parties responsible for overseeing or initiating corrective action.
performance measurement system	A system for capturing and processing data (including forms, procedures, information data bases, and reporting) to determine if the program is achieving its goals.
performance measures	Information of a quantitative or qualitative nature indicating program outcomes, outputs, or inputs. Performance measures are typically used to assess achievement of goals and/or objectives.
performance standards	A desired level of output or outcome as identified in statutes, regulations, contracts, management goals, industry practices, peer groups, or historical performance.
reportable condition	A matter coming to the auditor's attention that, in his/her judgment, should be communicated because it represents either an opportunity for improvement or a significant

	deficiency in management's ability to operate a program in an effective and efficient manner.
RFP	request for proposal.
SET	safety education and training.